



# GLOBAL HUMAN RIGHTS POLICY

## **Our Commitment:**

At MGM Resorts International (“MGM Resorts”) we are committed to respecting and supporting internationally recognized human rights. We are committed to treating all people, including our employees, guests, suppliers and community partners, with dignity and respect in the workplace and in the communities where we do business. MGM Resorts is a proud signatory of the United Nations Global Compact and ECPAT-USA’s Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism.

## **Scope:**

Our Global Human Rights Policy applies to all employees of MGM Resorts International. MGM Resorts expects any parties who do business with or on behalf of MGM Resorts to conduct business in ways that uphold the principles of this policy.

## **Our Focus:**

Our Global Human Rights Policy emphasizes MGM Resorts’ commitment to basic human rights as a core component of the way we do business and engage our employees. Our commitment to basic human rights focuses on the following areas:

Employees and Contractors: We value our employees as an integral part of our operation. We know our guests are treated well and our business operates most successfully when employees are treated with dignity and respect.

Guests: As part of achieving our vision to be the leader in hospitality and entertainment, we are committed to respecting and promoting our guests’ human rights.

Suppliers: We are committed to operating with integrity and this extends to our supply chain. We expect our suppliers to provide fair and safe working conditions for all workers and to treat their employees with dignity and respect.

Community Partners: As a leader in the hospitality and entertainment industry, MGM Resorts has an important role to play in supporting human rights in the communities where we do business. MGM Resorts participates in, and provides support to, multi-stakeholder collaborations, joining forces across the public and private sector to support and invest in the communities in which we operate.

## **Our Policies, Practices and Principles:**

We believe that human rights are fundamental rights to which all persons are entitled, without regard to sex or gender, race, color, national origin, ethnicity, ancestry, religion, age, socioeconomic status, sexual orientation, gender identity, gender expression, mental or physical disability, marital or veteran status, union affiliation, genetic information, or any other status or classification protected by law. Our Global Human Rights Policy emphasizes MGM Resorts’ commitment to actively work to uphold basic human rights in the workplace. This commitment/policy contains overarching principles that we embed into our policies and systems. Respect for human



# GLOBAL HUMAN RIGHTS POLICY

- **Policy Against Discrimination, Harassment and Retaliation** which clearly states that we do not tolerate harassment, discrimination, or retaliation in the workplace.
- **Fundamental labor principles** which include freedom of association and the right to make free decisions regarding collective bargaining, the prohibition of child labor and the prohibition of forced labor in all forms. MGM Resorts is committed to combating human trafficking, as well as the use of forced labor or child labor.
- **Employee Code of Conduct** which outlines our unwavering commitment to the highest standards of professional conduct and ethics. MGM Resorts' Code of Business Conduct and Ethics is disseminated to all employees upon hire, as well as available on the Company's internal employee (intranet) website and the Company's external website. MGM Resorts conducts annual required online training on the Code of Business Conduct and Ethics for all employees who hold the position of manager and above, and all employees in specific departments, regardless of level. Employees at all other levels receive the Key Points to the Code of Business Conduct and Ethics annually, which summary includes the above-mentioned policy.
- **Anti – Corruption Policy** which documents our commitment to comply with all applicable anti-corruption laws, regulation and policies.
- **Ethics Hotline and Non-Retaliation Policy** which provides employees an avenue to report suspected ethics violations with the safety of knowing they have protection from retaliation.
- **Commitment to Provide a Safe and Secure Workplace** which includes complying with applicable safety and health laws and regulations, as well as internal requirements. We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions.
- **Anti-Human Trafficking Policy and Training** which articulates the Company's unwavering commitment to combating human trafficking and protecting the dignity, equality, and fair treatment of all human beings. This includes providing awareness and responsive training to employees about the indicators of human trafficking, as well as the appropriate response to suspected human trafficking situations.

## **Expectations/Responsibilities:**

It is the responsibility of all employees to support human rights in the work environment, which includes:

- Understanding MGM Resorts' Global Human Rights Policy concerning basic human rights and upholding these rights in the workplace.
- Conducting business fairly, and that starts with the way we treat each other. We cultivate a diverse, inclusive, safe, lawful, and harmonious work environment that fosters respect for the humanity and dignity of all people, including employees, guests, suppliers and community partners.
- Contributing to a positive experience at MGM Resorts, acting in ways that promote inclusion, equity and safety for employee, guests, suppliers and community partners.
- Raising awareness of any behaviors or business situations involving MGM Resorts that may compromise the company's values around the provision of basic human rights.



# GLOBAL HUMAN RIGHTS POLICY

## **Communication and Updates:**

We regularly communicate our work in human rights to our board, investors and the public. We keep our policies and practices related to human rights under continuous review, recognizing the need to stay vigilant in a rapidly changing world. Additionally, we have engaged an independent company, Ethics Point, to operate an ethics and compliance hotline (the “Hotline”). This service provides a way to anonymously voice concerns and help MGM Resorts directly identify issues. To report any type of illegal, unethical, or unsafe behavior at work, you can:

- Call the Hotline toll-free at 877.597.7462
- Access Ethics Point via the web at [mgmethics.ethicspoint.com](http://mgmethics.ethicspoint.com)